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Scrial No. 10/619,275

## REMARKS/ARGUMENTS

This is in response to the Office Action mailed March 29, 2005. As acknowledged during the interview dated April 28, 2005, the Office Action is a non-final action and not a final action. Reconsideration of this application is respectfully requested.

## Claim Objections

The Office Action objected to claim 28 because the limitation "proxy server" lacked sufficient antecedent basis. Claim 28 is amended to depend from claim 25, thus providing sufficient antecedent basis for the "proxy server" limitation. The objection to claim 28 is thereby traversed.

Claim 17 is also amended to correct a typographical error in which "advisory" is corrected to read -- address --. No new matter has been added.

## Claim Rejections - 35 U.S.C. § 102

The Office Action rejected claims 16, 17, 30, 31 and 33 under 35 U.S.C. §102(e) as being anticipated by Petrunka et al. Applicant respectfully disagrees.

With respect to claim 16, Applicant respectfully submits that Petrunka et al. fail to anticipate the subject matter of claim 16 for at least the following reasons:

- 1) Claim 16 claims a system for enabling a requesting party to initiate a telephone call directly to a voice mail box associated with the service subscriber to a voice mail system. In Figure 4, Petrunka et al. teach that the requesting party (the caller) cannot initiate a telephone call directly to the voice mail box. Rather, the caller can only access the voice mail box by first placing a directory assistance call to an operator services switch (402) and only then after it is determined if: the called number is unpublished; the called party wishes to receive calls into a voice mail box; the caller is eligible to leave a message; and the caller wishes to leave a voice mail message.
- 2) Petrunka et al. fail to teach a call control node configured as a virtual service switching point in a switched telephone network. Petrunka et al. teach an

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operator services switch 32, which, as understood by any person skilled in the art, is a real switch in the telephone network; and a service computer 36 which supports voice and data connections but neither serves as a switch in the network in the sense of a service switching point, nor supports any of the functions of a virtual service switching point, and any person of ordinary skill in the art has knowledge to that effect.

3) Petrunka et al. fail to teach or suggest responding to the connection request message by formulating a call setup message to initiate establishment of a call connection to the VMS, the call set-up message having format reserved for redirected call set-up messages used by service switching points to redirect uncompleted calls to the service subscriber. In fact, Petrunka et al. in column 4, lines 24-46, teach directly away from this limitation. Petrunka et al. teach that the services computer 36 gains access to the voice mail system using a direct voice mail box system number provided to it. In other words, the service computer 36 launches a call to the voice mail system "through a series of switches". Consequently, as would be understood by any person skilled in the art, the service computer 36 dials the call as would any system seeking administrative access to the voice mail system. As further taught, services computer 36 gains access to the voice mail system by providing the system with any necessary access information, such as a password. Again, this teaches directly away from the invention claimed in claim 16. Petrunka et al. further teach that after accessing voice mail box system 39, the service computer provides the voice mail system with the necessary codes required to leave a message in a voice mail box. Again, this teaches directly away from the invention claimed in claim 16,

It is therefore respectfully submitted that the rejection of claim 16 is unfounded and it is requested that the rejection be withdrawn.

With respect to claim 17, the Office Action relies on column 4 of Petrunka et al. Column 4 mentions the possibility of an AIN implementation of the invention but does not explicitly reference the common channel signaling network, signaling system 7, or

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an integrated services digital network-user part initial address message. It is established law that in order to anticipate, the cited reference must teach every feature of the claimed invention. It is respectfully submitted that Petrunka et al. fail to teach or suggest explicitly or implicitly the features of claims 16 and 17 and, for reasons set forth above, the rejection of claim 17 is thereby traversed.

Respecting claim 30, the Office Action rejects the claim for the same reasons as claim 16. Consequently, all of the arguments applied above with respect to claim 16 apply. In addition, claim 30 claims means for formulating a common channel signaling initial address message containing a redirecting number parameter to connect the requesting party directly to the voice mail box of the VMS service subscriber. Petrunka et al. fail to teach or suggest any means for formulating a common channel signaling initial address message containing a redirecting number parameter. Rather, Petrunka et al. teach launching a call from a services computer, establishing a link through the public switched telephone network to the voice mail system and then instructing the operator services switch 32 to connect the caller 30 to the accessed voice mail box. As would be understood by any person skilled in the art, the connection must be made via the services computer 36 and the link established by the services computer 36. This teaches directly away from the invention claimed in claim 30 which claims a directory service with a direct to voice mail option that formulates a common channel signaling Initial Address Message containing the redirecting number parameter to connect the requesting party directly to the voice mail box. Petrunka et al. therefore fail to teach or suggest the limitations of claim 30 and the rejection of claim 30 is traversed.

With respect to claim 31, the Office Action relies on Figure 3 of Petrunka et al. Figure 3 clearly demonstrates the system described above with respect to claim 30 and for the same reasons the rejection of claim 31 is traversed.

With respect to respect to claim 33, the Office Action also relies on Figure 3. It is unclear what elements in Figure 3 are assumed to anticipate a virtual switching point in a public switched telephone network which is a physical node in the common channel signaling network of the PSTN. If the services computer 36 is intended, it

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supports voice connections and therefore cannot consider a virtual switching point in the public switched telephone network. The rejection of claim 33 is thereby traversed.

## Claim Rejections - 35 U.S.C. § 103

The Office Action rejected claim 18 under 35 U.S.C. §103(a) as being unpatentable over Petrunka et al. in view of Holt. Applicant respectfully disagrees.

The Office Action admits that Petrunka et al. fail to disclose the claimed inserting limitations of inserting an original called number parameter, a redirecting number parameter and a redirection information parameter into an initial address message. The Office Action maintains that this is taught by Holt in column 5. Applicant disagrees. Holt teaches that a SCP 204 determines the voice mail access number searching the database associated with the SCP for the voice mail access number that corresponds to the subscriber's directory number.

Holt further teaches that a FORWARD\_CALL response message 218 set by the SCP 20 sets the last redirecting party number to the subscriber's directory number. However, Holt teaches that the SSP 202 sets up a call 220 to the voice mail system 206 and sends call integration information 224 over the VMSs Simplified Message Desk Interface (SMDI) link. The call integration information 224 identifies both the original called party number and the last redirecting party number as the subscriber's directory number. This teaches directly away from the system claimed in claim 18 which teaches that the call control node formulates an IAM and performs the inserting steps. As is understood by any person skilled in the art, Holt fails to teach or suggest formulating an IAM, much less either of the steps of inserting. The SSP as taught by Holt in column 5, line 66-column 6, line 4 teaches passing information over the SMDI link to the voice mail system. As is understood by any person skilled in the art, the SMDI is a signaling link that does not use the SSS 7 protocol. Consequently, Holt teaches directly away from the invention claimed in claim 18 and the rejection of claim 18 is traversed.

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The Office Action rejected claims 19-24, 28 and 29 under 35 U.S.C. § 103(a) as being unpatentable over Petrunka et al. and Holt and further in view of Russell. With respect to claim 19, no combination of Petrunka et al. and Holt

teaches the steps of inscrting as described above and the rejection of claim 19 is traversed.

With respect to claim 20, the Office Action relics on Figures 3 and 5 of Holt and Figure 4 of Petrunka et al. However, Figures 3 and 5 of Holt teach only signaling between an SSP, an SCP in a voice mail system and teach nothing of a call control node comprising a call control application adapted to control the call control node. The rejection of claims 20-24 is thereby traversed.

Respecting claim 28, claim 28 is amended to correctly depend from claim 25. Claim 25 claims a worldwide web server adapted to receive click-to-voice mail notifications from at least one web page and to relay the connection request message to the call control application conforming to a predefined format. Neither Holt nor Petrunka et al. teach any such system or suggest any such system. The rejection to claims 28 and 29 is thereby traversed.

The Office Action rejected claims 25-27 under 35 U.S.C. 103(a) as being unpatentable over Petrunka in combination with Holt and Russell and further in view of Tov. Tov teaches in paragraph 36 that the media types for contact include instant messaging, text, audio and video but teaches nothing of direct access to a voice mail system. Consequently, no combination of the cited references teach or suggest the invention claimed in claims 25-27 and the rejection of those claims is traversed.

The Office Action rejected claims 32 and 34 under 35 U.S.C. 103(a) as being unpatentable over Petrunka et al. in view of Tov. The Office Action relies on the teaching of Tov, paragraph 41. Paragraph 41 teaches using a plug-in, Java applet, link or button that creates a multimedia-over-IP and/or voice-over-IP call to the subscriber or calls a PSTN phone or wireless device, or sends messages to an instant messaging device or sends messages to PAGERS or to a device that supports SMS, etc. The visitor, when accessing his personal visitor page, may decide to click this button or link where he/she will be connected (using a voice or multimedia call) to the subscriber or a subscriber

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service, such as voice mail, without having to become a subscriber him/her self. The operation will be performed in accordance to the subscriber's active policy and the presence of the devices. Tov, however, fails to teach or suggest direct access to a voice mail system. There is no implication or teaching in Tov that would lead a person of ordinary skill in the art to a directory service application as instantiated on a worldwide web server adapted to interact with the requesting party through the Internet. The simple plug-in or applets taught by Tov have no equivalents to the invention claimed in claim 32 and the rejection of claim 32 is traversed.

Respecting claim 34, Petrunka et al. fail to teach or suggest a call control node comprising a call control application, much less a call control application that is adapted to interface with an Internet Protocol network or further adapted to provide call control functions to the call control node. The Office Action asserts that Tov discloses this limitation. While Applicant concedes that Tov teaches functionality embodied in an Internet Protocol network, Tov neither teaches nor suggests anything that would lead one to the invention claimed in claims 32 and 34. The rejection of those claims is thereby traversed. The Office Action rejected claims 35-40 under 35 U.S.C. as being unpatentable over Petrunka et al. in view of Holt and Tov.

The Office Action admits that Petrunka et al. and Holt fail to disclose the claimed user interface. The Office Action asserts that Tov discloses the user interface. Applicant respectfully disagrees.

The interface taught by Tov is an interface that permits a subscriber to call a specific person (Fig. 5) or to send that specific person a text or SMS message. The interface does not provide a button permitting direct access to a voice mail system. The rejection of claims 35-40 is thereby traversed.

In summary, it is clear that:

Petrunka et al. teach a manual operator station that permits a caller seeking a private directory number to be directed through a call service computer to a voice mail box of the unlisted subscriber number if the caller is permitted to leave a voice mail message as determined by a human operator. Access is through a complicated

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system controlled by the operator services switch that requires manual input by the human operator as well as a dial up connection through the call service computer which establishes a voice connection to the voice mail box by sending administrative commands to the voice mail system.

Holt teaches a system and method for routing a call to a voice mail system where routing information is supplied by service control point and linking information is passed over a Small Message Desk Interface to a voice mail system in order to set up the connection. No direct connection is supported.

Toy teaches a method of permitting Internet service subscriber's to expose person-specific personalization of their visitor web pages that display buttons to permit a person accessing the web page to either call the person or to send the person a text or SMS message. No direct access to a voice mail system is taught or supported.

For all the reasons set forth above, it respectfully submitted that no combination of the cited references teach or suggest the invention claimed in claims 16-40 which remain pending in this application. It is therefore respectfully submitted that claims 16-40 are in a condition for immediate allowance and favorable reconsideration as well as carly issuance of a Notice of Allowance are therefore requested.

Respectfully submitted,

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